

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	Cr. No. 15-10338-FDS
v.	)	
	)	
OSCAR NOE RECINOS-GARCIA,	)	
A/K/A "PSYCHO," ET AL.	)	
Defendants.	)	

**STATUS REPORT REGARDING DISCOVERY**

Pursuant to the Court's Order, dated April 27, 2016, the government provides the following status report regarding discovery.

**I. Discovery Update**

The government provided automatic disclosures on August 19, 2016. The government has also provided counsel for the defendants with an updated index summarizing: (i) the dates of each audio/video recording involving CW-1; (ii) the identities of the individuals that the government has to date identified in the recordings (and in some cases, a brief description of the contents of the recording); (iii) the transcriptions prepared to date, and those that the government is in the process of preparing; (iv) the FBI identification number of the recording; and (v) the Global Discovery production number in which the recording has been produced.

The government has substantially completed its rolling production of pre-indictment discovery, and expects to produce

the balance of pre-indictment discovery in its next Global Discovery production which will be produced tomorrow, October 4, 2016. This disclosure will include materials concerning six members of MS-13 that murdered a 16-year-old, Jose Aguilar-Villanueva, a/k/a "Fantasma," in July 2015. The government is in the process of compiling Global Discovery relating to this new murder, and expects to produce a substantial amount of the discovery concerning the new murder with the next disclosure.

As noted in previous status reports, the government has, and is continuing to produce, certain categories of early Jencks. However, there are certain categories of Jencks that the government cannot disclose at this stage of the case due to safety concerns for witnesses and their respective families. The government intends to produce additional Jencks material after it has taken all reasonable steps to ensure the safety of witnesses and their families--both in the United States and abroad. Finally, the government is continuing to receive new reports and materials, which the government will produce on a rolling basis.

## **II. Detention Facilities Discovery Update**

The four laptops for use at the Wyatt Detention Facility were delivered last week. As requested by the facility, a discovery hard drive was delivered last week to the Norfolk County Correctional Center in Dedham. One laptop computer for

each of the listed institutions, M.C.I. Cedar junction and the Nashua Street jail in Suffolk County; and two laptops for the Plymouth County Correctional Facility will be ready to be delivered tomorrow, October 4, 2016. Two laptop computers are presently unassigned.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Peter K. Levitt  
Peter K. Levitt  
Christopher Pohl  
Glenn A. MacKinlay  
Assistant U.S. Attorneys

Dated: October 3, 2016

**CERTIFICATE OF SERVICE**

I, Glenn A. MacKinlay, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

s/ Glenn A. MacKinlay  
Glenn A. MacKinlay  
Assistant U.S. Attorney

Dated: October 3, 2016